REMARKS

Claims 1-21 are pending in the application. Examiner's reconsideration of the rejections and objections set forth in the Office Action is respectfully requested in view of the above amendments and the following remarks.

Specification Objections

The specification was objected to for the reasons set forth on page 2 of the Office Action. The specification was amended as suggested. However, the objection labeled "a)" (page 10, line 4) appears to be erroneous. Accordingly, withdrawal of the objections is respectfully requested.

Claim Rejections- 35 U.S.C. § 102

Claims 1-3, 8, 11-12 and 15 stand rejected as being anticipated by U.S. Patent No. 5,778,362 to Nanjo et al., for the reasons set forth on pages 3-5 of the Office Action. Applicants respectfully submit that at the very minimum, Nanjo fails to disclose or suggest the inventions of claims 1 and 15.

In particular, Nanjo fails to disclose or suggest a method for managing textual database including, e.g., *transcribing textual data into corresponding semantic units of words*, or *generating an index based on semantic units of words for indexing stored textual data with the corresponding semantic units*, as essentially claimed in claims 1 and 15.

In the Office Action, Examiner contends (on page 3) that Nanjo "inherently" discloses transcribing text files into "semantic units". Further, Examiner broadly interprets "semantic units" as being a letter, phoneme, syllable, morpheme, word or phrase.

In the first instance, Applicants respectfully disagree with Examiner's contention that Nanjo "inherently" discloses "semantic units." Indeed, in stark contrast, Nanjo expressly states

that the disclosed *"method is not dictionary-based and requires <u>no special understanding of the</u>* <u>*language being indexed or searched*</u>" (see, Col. 3, lines 12-15). In other words, it cannot be reasonably argued that <u>Nanjo</u> inherently discloses "semantic units" when <u>Nanjo</u>'s method does not even require an understanding of the language being indexed. Indeed, transcribing textual data into *semantic units of words*, such as syllables or morphemes, implies understanding of the language so that the textual data can be parsed into such semantic units of words.

In any event, <u>Nanjo</u> clearly does not teach transcribing/indexing based on *semantic units of words*, as essentially claimed in claims 1 and 15. Indeed, <u>Nanjo</u> discloses (Col. 12, lines 16-37, for example) that indexing involves *breaking a string into preliminary index terms, which are each a longest substring that contains only word characters*. This is different than breaking textual data into a string of semantic units of words, such as syllables or morphemes. Therefore, <u>Nanjo</u> does not teach or suggest or inherently disclose transcribing and indexing based on "semantic units", much less "semantic units of words".

Accordingly, for at least the above reasons, claims 1 and 15 are patentably distinct and patentable over <u>Nanjo.</u> In addition, claims 2-3, 8 and 11-12 are patentably distinct and patentable over <u>Nanjo</u> at least by virtue of their dependence from claim 1. Thus, withdrawal of the anticipation rejections is respectfully requested.

Claim Rejections- 35 U.S.C. § 103

The following obvious rejections were asserted in the Office Action:

(i) Claims 7, 10 and 14 stand rejected as being unpatentable over <u>Nanjo</u>, for the reasons set forth on pages 5-6 of the Office Action;

(ii) Claims 4-6, 16 and 18-21 stand rejected as being unpatentable over <u>Nanjo</u> in view of U.S. Patent No 5,960,447 to <u>Holt</u> et al., for the reasons set forth on pages 7-10 of the Office

-8-

Action; and

(iii) Claims 9 and 17 stand rejected as being unpatentable over <u>Nanjo</u> in view of U.S.

Patent No 5,933,525 to <u>Makhoul</u> et al., for the reasons set forth on pages 10-11 of the Office

Action.

The above rejections are based, in part, on Examiner's reliance on <u>Nanjo</u> as disclosing

transcribing/indexing based on semantic units. However, <u>Nanjo</u> does not disclose or suggest

transcribing/indexing based on semantic units of words, as essentially claimed in claims 1, 15

and 16. Therefore, the above cited combinations of references fail to establish a *prima facie* case

of obviousness against claim 16 and all claims that depend from claim 1 and 16. Therefore,

withdrawal of the obviousness rejections is respectfully requested.

In view of the foregoing amendments and remarks, it is respectfully submitted that all the

claims now pending in the application are in condition for allowance. Early and favorable

reconsideration of the case is respectfully requested.

Respectfully submitted,

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-9-